

## EXHIBIT 4

BUTLER | SNOW

June 13, 2013

**VIA E-MAIL**

Bryan Aylstock, Esq.  
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RE: *In re: Ethicon, Inc. Pelvic Repair System, Products Liability Litigation,*  
MDL No. 2327

Dear Bryan:

I am writing in advance of the deposition of Renee Selman that is scheduled for June 20, 2013. Your team has asked several questions about her custodial collection, and we have looked into the issues that you raise.

After reviewing her available custodial documents, we have produced the 25 responsive documents to you.

We have determined that the source of those documents that were promoted for review were from a hard drive used by Ms. Selman that contains data from approximately 1998 to 2005. However, we have been unable to locate any data from the hard drive that Ms. Selman would have used between 2005 and when she left the company in 2010.

As you know, we have produced thousands of other documents sent by or to Ms. Selman from other custodial collections. We would be glad to place these in a separate folder to facilitate your review of them.

We are continuing to search for other data, but at this point we do not know whether or not it will be located. Accordingly, I wanted to advise you of this prior to her deposition.

Given that we are less than a week away from her deposition, and as we discussed today, I wanted to let you know about this so that you can make a determination as to whether you want to go forward with the deposition. If it is your desire to postpone it, let me know and we will look for other dates in the near future.

I am sure that you will have follow up questions, and I will be glad to answer them when I have additional information.

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**BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC**

Bryan Aylstock, Esq.  
June 13, 2013  
Page 2

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC



Christy D. Jones

CDJ:fsw

cc: Tom P. Cartmell  
D. Renee Baggett

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